AMENDMENTS TO THE DRAWINGS:

The drawings are amended as described below by presenting replacement figures as attached hereto.

In the Office Action at page 2, the Examiner objected to the drawings. In order to overcome these objections, a replacement figure is submitted herewith. In FIG. 6, the primary crystal grain boundaries are shown inclined to a current direction between active channel regions of the thin film transistor at an angle of -45° $\leq \Theta \leq$ 45°. Approval of these changes to the drawings is respectfully requested.

Furthermore, FIGS. 2A and 2B also illustrate primary crystal grain boundaries inclined to a current direction between active channel regions of the thin film transistor at an angle of -45° \leq $\Theta \leq$ 45°. Accordingly, Applicants assert that the drawings show every feature of the invention and respectfully request that the objection to the drawings be withdrawn.

REMARKS

None of the claims have been amended or cancelled herein. Claims 1 and 7 are the independent claims. In view of the above, it is respectfully submitted that claims 1-12 are pending. No new matter is presented and entry and reconsideration are respectfully requested.

DRAWINGS:

In the Office Action at page 2, the Examiner objected to the drawings under 37 CFR 1.83(a). In order to overcome these objections, a replacement figure is submitted herewith. Furthermore, although the Office Action indicates that the drawings fail to show every feature of the invention specified in the claims, Applicants note that all such features are illustrated in the drawings. In particular, the primary crystal grain boundaries are shown inclined to a current direction between active channel regions of the thin film transistor at an angle of -45° $\leq \Theta \leq 45^\circ$, as illustrated in FIGS. 2A and 2B.

Accordingly, Applicants respectfully request that the objection to the drawings be withdrawn.

REJECTIONS UNDER 35 U.S.C. §102:

Claims 1, 2, 4, 7, 8, and 10 are rejected under 35 U.S.C. §102(e) as being anticipated by <u>Isobe</u> et al. (U.S. Patent No. 6,890,840).

Regarding the rejection claim 1, it is noted that claim 1 recites a thin film transistor (TFT) comprising a lightly doped drain (LDD) region or offset region, wherein the thin film transistor is formed so that **primary crystal grain boundaries** of a polysilicon substrate are not positioned in the LDD or offset region. Applicants respectfully assert that <u>Isobe</u> fails to teach or suggest each of these features.

For support, Applicants note that <u>Isobe</u> does not, in fact, disclose this subject matter, notwithstanding the statements of the Examiner to the contrary.

In detail the Office Action states that Isobe discloses that the crystal aggregate

boundaries are located outside of the TFT formation region and that the aggregate boundaries are the primary grain boundaries. However, a review of <u>Isobe</u> shows the formation of a channel formation region, or a TFT formation region, using one crystal aggregate (domain) by controlling crystal location and size, thus suppressing TFT variations. Each TFT formation region is isolated, a metallic element for promoting crystallization (typically Ni) is added, and heat treatment is performed, thus making it possible to arbitrarily determine the locations of crystal aggregates (domains) (abstract). In other words, <u>Isobe</u> discloses a method for forming a channel formation region using a metal induced lateral crystallization (MILC) method.

As noted in the previous response dated October 13, 2005, an MILC method cannot form primary crystal grain boundaries and therefore since <u>Isobe</u> discloses using an MILC method, Isobe fails to teach or suggest primary crystal grain boundaries as well as the other features recited in independent claim 1. Support for such statement can be found in U.S. Patent No. 6,274,888 to Suzuki which describes a method of growing crystals using an MILC method (see FIGS. 4A-4D, 7A-7D, 8A-8F and 9A-9F and column 8, lines 26-50). The MILC method disclosed by Suzuki includes forming a first a-Si thin film 11 on a substrate 3, depositing a metal film 14 on the first a -Si thin film and forming an opening 15 in the metal film 14. After several processes, the a-Si film 11 under the metal film 14 is transformed into the p-Si film 16, and then the lateral growth of the crystalline grains occurs. In other words, the metal film 14 is absorbed completely by the a-Si film. To continue crystal growth, a second a-Si film is deposited over the entire area and irradiation of excimer laser onto the a-Si film 18 crystallizes the a-Si film 18 and so forth (column 9, lines 18-65). Accordingly, in the MILC method, the continuous application and treatment of films over the crystal, prevents formation of primary crystal grain boundaries. As noted above, Isobe discloses such an MILC method and thus cannot form primary crystal grain boundaries as recited in independent claim 1.

Accordingly, Applicants respectfully assert that the rejection of claim 1 under 35 U.S.C. § 102(e) should be withdrawn because <u>Isobe</u> fails to teach or suggest each feature of independent claim 1.

Furthermore, Applicants respectfully assert that dependent claims 2 and 4 are allowable at least because of their dependence from claim 1, and because they include additional features which are not taught or suggested by the prior art. Therefore, it is respectfully submitted that claims 2 and 4 also distinguish over the prior art.

Regarding the rejection of claim 7, it is noted that claim 7 recites a flat panel display device comprising, a thin film transistor comprising an LDD region or offset region, wherein the thin film transistor is formed so that primary crystal grain boundaries of a polysilicon substrate are not positioned in the LDD or offset region. Applicants respectfully assert that <u>Isobe</u> fails to teach or suggest each of these features.

As noted above, <u>Isobe</u> discloses a method of forming a channel formation region, or a TFT formation region, using one crystal aggregate (domain) by controlling crystal location and size, thus suppressing TFT variations, using an MILC method. As also noted above, in an MILC method primary crystal grain boundaries cannot be formed and therefore <u>Isobe</u> fails to teach or suggest primary crystal grain boundaries.

Accordingly, Applicants respectfully assert that the rejection of claim 7 under 35 U.S.C. § 102(e) should be withdrawn because <u>Isobe</u> fails to teach or suggest each feature of independent claim 7.

Furthermore, Applicants respectfully assert that dependent claims 8 and 10 are allowable at least because of their dependence from claim 7, and because they include additional features which are not taught or suggested by the prior art. Therefore, it is respectfully submitted that claims 8 and 10 also distinguish over the prior art.

REJECTIONS UNDER 35 U.S.C. §103:

Claims 1-12 are rejected under 35 U.S.C. §103(a) as being unpatentable over Zhang et al. (U.S. Patent 5,563,426) in view of Suzuki et al. (U.S. Patent 6,274,888).

Regarding the rejection of claim 1, it is noted that claim 1 recites a thin film transistor (TFT) comprising a lightly doped drain (LDD) region or offset region, wherein the thin film transistor is formed so that **primary crystal grain boundaries** of a polysilicon substrate are not positioned in the LDD or offset region.

The Office Action states that <u>Zhang</u> discloses a TFT formed so that primary crystal grain boundaries 4 of a polysilicon substrate are formed outside the TFT formation regions (FIGS. 1B, 1C and 4C). The Office Action recognizes that <u>Zhang</u> fails to teach an LDD region and relies on <u>Suzuki</u> for such teaching. Applicants respectfully assert that the combination of <u>Zhang</u> and

<u>Suzuki</u> fails to disclose each of these features and furthermore there is no teaching or suggestion to combine these references to teach the feature of independent claim 1.

Zhang discloses a method of manufacturing a TFT using a crystal silicon film obtained by crystallizing an amorphous silicon film using a plurality of island nickel films (column 11, lines 21-22). The TFT includes island nickel regions 2, portions 3, inter-crystalline boundaries 4, an intermediate region 5, a semiconductor region 6 and a gate wire 7 (column 12, lines 25-55; FIGS. 1A-1C). In other words, Zhang discloses a method of manufacturing a TFT using metal induce lateral crystallization (MILC). As noted above, in an MILC method primary crystal grain boundaries cannot be created and therefore, although Zhang discloses inter-crystalline boundaries 4, these boundaries are not primary crystal grain boundaries and they are not positioned in the LDD region, as recited in independent claim 1.

As noted above, <u>Suzuki</u> also discloses a TFT manufactured using an MILC method, and thus <u>Suzuki</u> also fails to teach or suggest thin film transistor formed so that **primary crystal grain boundaries** of a polysilicon substrate are not positioned in the LDD or offset region, as recited in independent claim 1.

Furthermore, assuming that the inter-crystalline barriers 4 of <u>Zhang</u> were primary crystal grain boundaries as alleged in the Office Action, then it would not be obvious to combine the teaches of <u>Zhang</u> with <u>Suzuki</u> since the references would teach two distinct methods for forming crystal structures. Accordingly, there would be no motivation to combine features from two references using two distinct methods to teach the features on independent claim 1 and only through hindsight would one be motivated to combine <u>Zhang</u> and <u>Suzuki</u>.

Accordingly, Applicants respectfully assert that the rejection of claim 1 under 35 U.S.C. § 103(a) should be withdrawn because neither <u>Zhang</u> nor <u>Suzuki</u>, whether taken singly or combined, teach or suggest each feature of independent claim 1.

Furthermore, Applicants respectfully assert that dependent claims 2-6 are allowable at least because of their dependence from claim 1, and because they include additional features which are not taught or suggested by the prior art. Therefore, it is respectfully submitted that claims 2-6 also distinguish over the prior art.

Regarding the rejection of independent claim 7, it is noted that claim 7 recites a flat panel

display device comprising, a thin film transistor comprising an LDD region or offset region, wherein the thin film transistor is formed so that primary crystal grain boundaries of a polysilicon substrate are not positioned in the LDD or offset region. Applicants respectfully assert that the combination of <u>Zhang</u> and <u>Suzuki</u> fails to disclose each of these features and furthermore there is no teaching or suggestion to combine these references to teach the feature of independent claim 7.

As noted above, although <u>Zhang</u> discloses inter-crystalline boundaries 4, these boundaries are not primary crystal grain boundaries and they are not positioned in the LDD region, as recited in independent claim 7.

As also noted above, <u>Suzuki</u> fails to cure the deficiencies of <u>Zhang</u> since <u>Suzuki</u> describes a method of growing crystals using an MILC method.

Accordingly, Applicants respectfully assert that the rejection of claim 7 under 35 U.S.C. § 102(e) should be withdrawn because neither <u>Zhang</u> nor <u>Suzuki</u>, whether taken singly or combined teach or suggest each feature of independent claim 7.

Furthermore, Applicants respectfully assert that dependent claims 9-12 are allowable at least because of their dependence from claim 7, and because they include additional features which are not taught or suggested by the prior art. Therefore, it is respectfully submitted that claims 9-12 also distinguish over the prior art.

CONCLUSION:

In accordance with the foregoing, it is respectfully submitted that all outstanding rejections have been overcome and/or rendered moot. And further, that all pending claims patentably distinguish over the prior art. There being no further outstanding rejections, the application is submitted as being in condition for allowance which action is earnestly solicited.

At a minimum, the Board should enter this Response at least for purposes of Appeal as it either clarifies and/or narrows the issues for consideration.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 50-3333.

Respectfully submitted,

STEIN, MCEWEN & BUI, LLP

Date: 4/14/06

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